

Statement from Supervisor Edward P. Romaine on the Fire Island To Montauk Point Draft Environmental Impact Statement and Plan

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Farmingville, NY – The Town of Brookhaven has responsibility for communities on Fire Island, for communities along the south shore of mainland Long Island, and for a large portion of south shore bays and tributaries.

The Town knows there is a strong need for the 1.2 billion dollars of funding available to projects in the Fire Island to Montauk Point Plan to be spent wisely. There are aspects of the Plan that we agree with; these include:

1. Sand bypassing at inlets so as to mimic the natural littoral drift of sand along the ocean shoreline.
2. The creation of berm and dune protective features in barrier island communities.

However, there are also aspects of the FIMP Draft Environmental Impact Statement and Plan that we do not believe are appropriate. Problems within the Plan and DEIS include:

1. The plan was started so long ago that certain aspects appear obsolete. The Breach Contingency Plan needs to be thoroughly updated to include benefits to the long term existence of the barrier island that breaches may contribute to by the transport of sand into the bays that can form the foundation for the barrier island as it moves north in response to sea level rise.

2. The study of climate and response to carbon emissions associated with human activities has been one of the fastest moving scientific fields over the last twenty years. Our understanding of the planet's climate systems has substantially increased during that period, yet the Plan and DEIS are based on data that is mostly more than a decade old. The Plan should be updated through adaptive management with the best and most recent climate data.

3. The projections for sea-level rise in the Plan and DEIS are based on historic data. Again, much of this data should not be used because more recent information is indicating that sea-level rise is accelerating. Substantial investments to determine the most likely sea-level rise scenarios have been made by New York State and New York City. These projections should replace the projections that are used in the Plan and DEIS that are based on historical rates of sea level change as measured at Sandy Hook, NJ.

4. The non-structural solution of raising 4,400 homes will create stilt villages surrounded by marshes with non-functional sanitary systems. The Town favors a strong voluntary buyout program to replace the current proposal for raising houses. A buyout program offers a valid, resilient long-term solution that moves Town residents out of harm's way.

5. The Plan and DEIS completely ignore benefits to water quality from the Wilderness Area breach. At this point there is a wealth of data on the water quality benefits to the south shore bays that are associated with the breach. This data should be used to inform a revised Breach Contingency Plan.

6. Long-term costs to local governments are not clear in the Plan and DEIS. Will local Erosion Control Districts be responsible for moving and grading the sand placed on beaches? Will Town residents have to fund long-term maintenance costs of the project? The answers to these questions are not obvious upon reading the Plan, DEIS and associated documents. If the Erosion Control Districts cannot cover the costs what happens? In terms of local costs the Army Corps must be cognizant that local governments in New York State generally have to budget within a very tight state tax cap. If that cap is broken there are financial consequences for the local governments. The tax cap is often cited as 2%, but a more realistic figure when contractual obligations are accounted for is around .67% With caps this tight it is imperative that local governments have a good understanding of any financial obligations related to the FIMP Plan.

7. There is a plethora of recent water quality data in existence that has not been incorporated into planning for inlet maintenance or the Breach Contingency Plan. Many of the affected waters have shellfishing and nutrient impairments, and these impairments are not recognized by the DEIS or the FIMP. A non-structural solution that should be funded through this Plan is the replacement of aging sanitary systems with new innovative/alternative sanitary systems that remove nutrients from wastewater. Recent data has shown that groundwater has been impacted by nutrients from

sanitary waste and that those nutrients are causing marsh vegetation to have stunted root systems. This in turn adversely affects our marshes and wetlands, our first line of defense against storms and flooding. The Plan should be modified to acknowledge and fund this need.

8. When protective features are built, such as dunes, the highest standards must be employed to ensure the dunes are as strong and stable as possible. This includes prohibition of construction on dunes, or above dunes where constructed features would shade plants that stabilize and strengthen the dune.

Thank you for this opportunity to comment on this important Plan and DEIS. It is my fervent hope that through adapting the plan to recent information it can be strengthened so that our barrier islands and shorelines benefit far into the future, and not just for a few years.

The following comments refer to the FIMP document itself.

Raising homes without adding resiliency to the existing septic systems is going to continue to allow coastal structures to pollute the coastal waters. Septic systems should be raised a minimum of three feet above local ground water and employ technologies to reduce nitrogen and sepsis loading to our local groundwater. Raising homes to increase their habitability in our low lying coastal communities will continue the degradation of our coastal waters. This decline of our costal water quality will result in a significant loss of wetlands, which is counterproductive to flood management.

In lower lying areas where tidal wetlands are migrating landward, raising existing structures will impede the natural migration of the wetlands landward caused by storm events and sea level rise. In these instances, buying out properties would be more consistent with preserving the ecological integrity of the wetlands and reducing repetitive loss these homes may have from storm events.

The document acknowledges the use of a low (historic) rate of Relative Sea Level Change. It may be necessary to increase the freeboard requirements to account for changes in flood maps that may occur due to future storm events, erosion, and higher than expected global sea level rise. Structures in an "A" zone today may be in a "V" zone tomorrow. Properties that are split zoned, that is, have multiple flood zones crossing the property, should be built to the highest flood zone requirements.

Raising roads may segregate existing low and high marshes from their water supply that is necessary to maintain the ecological habitat that currently exists. Structures that keep tidal waters away from homes may also keep stormwater from leaving the low lying areas and exacerbate local flooding. All of the areas where roads are proposed to be heightened, are in areas of high groundwater, with little recharge available through normal infiltration.

While it is important to protect the existing communities on Fire Island, protecting the entire Island is equally important to the South Shore of Fire Island. While some breach prone areas may or will get sand, it is not clear whether other areas on Fire Island will be protected. These areas could be potential breach sites in the future because of the cumulative effects of storms and sea level rise. The entire barrier island is important to preserving and minimizing flooding along the south shore of the Town of Brookhaven.

The document does not address the resiliency of the access points to Fire Island within the Town of Brookhaven such as the commercial and recreational docks located at Great Gun Marina, Bellport Village Marina, both on the Mainland and Fire Island, Watch Hill, Davis Park, Water Island, Fire Island Pines, Cherry Grove, and Ocean Bay Park and the ferry access points in Patchogue.

Ho-Hum Beach (Village of Bellport Ocean Beach) and Great Gun Beach are not indicated to be part of the beach nourishment project and the document does not indicate that these areas will receive sand unless these areas are breached. These recreational opportunities these areas provide are important to the local community and should be protected and maintained similar to the areas within the communities.

The document indicates that periodic maintenance and monitoring would be required. The onus for doing this appears from the document to be the state. The Town of Brookhaven has established within most of its communities, beach erosion control districts. These districts have been maintaining the local beaches to ensure that they keep their

“engineered status.” The Town believes that block grants to the Town to allow the erosion control districts to monitor and maintain the beaches would be more efficient and allow the local communities to spend money in a way most suitable for the conditions of the beach.

Town infrastructure along the mainland of the south shore includes municipal bulkheads, docks, beaches, groins and jetties. The protection of the Town’s infrastructure should be included in the document so that the protection of these areas within the FIMP would be eligible for funding to be repaired or to be eligible for repair as their effectiveness is reduced because of storm related effects or sea level rise.

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